

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,
PELVIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBITS:

**JOINT MOTION TO DISMISS DEFENDANT
AMERICAN MEDICAL SYSTEMS, INC. WITHOUT PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibits A-F and defendant American Medical Systems, Inc. ("AMS") advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and AMS jointly move the court to dismiss AMS as a defendant in these actions without prejudice, and terminate AMS from the docket in the actions, parties to bear their own costs. Other defendants remain in these actions, and Plaintiffs will continue to prosecute these actions against them.

Respectfully:

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Dated: January 5, 2016

EXHIBIT A – ANDRUS WAGSTAFF

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:14-CV-00774	Wilda Cormier v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT B – DISCEPOLO

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:12-CV-05238	Ann Manson, William Manson v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT C – JOHNSON BECKER

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-00645	Vicki Courtney v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT D – MOTLEY RICE

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:14-CV-00832	Sharon Elder, Duane Elder v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT E – PROVOST UMPHREY

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-09429	Melissa Thomas v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT F – SIMMONS HANLY CONROY

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-31730	Jeanne Garbas v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on January 5, 2016, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Barbara R. Binis